

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X	
CHEVRON CORPORATION,	:
	:
Plaintiff,	:
	:
-against-	:
	:
STEVEN R. DONZIGER, et al.,	:
	:
Defendants.	:
	:
----- X	

Case No. 11 Civ. 0691 (LAK)

**PLAINTIFF CHEVRON CORPORATION'S NOTICE OF MOTION TO SANCTION  
THE DONZIGER DEFENDANTS FOR DISOBEYING THE COURT'S DISCOVERY  
ORDERS**

PLEASE TAKE NOTICE that upon the Declaration of Jefferson E. Bell, dated September 27, 2013, together with the exhibits thereto, and the accompanying Memorandum of Law submitted herewith, Plaintiff Chevron Corporation will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, for an order, pursuant to Rule 37 of the Federal Rules of Civil Procedure and the Court's inherent power, imposing sanctions against Steven Donziger, the Law Firm of Steven R. Donziger, and Donziger & Associates, PLLC for disobeying the Court's discovery orders.

Dated: September 27, 2013  
New York, New York

Respectfully submitted,

/s/ Randy M. Mastro  
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